



Eric Shapland
+1 213.243.4238 Direct
Eric.Shapland@arnoldporter.com

July 17, 2023

VIA E-MAIL

Magistrate Judge Lisa A. Jensen
United States District Court
Northern District of Illinois
327 South Church Street
Courtroom 3200
Rockford, IL 61101

Re: *City of Rockford, et al. v. United Biosource Corporation, et al.*,
Case No. 3:17-cv-50107
*MSP Recovery Claims, Series LLC, et al. v. United Biosource
Corporation, et al.*, Case No. 3:20-cv-50056

Dear Judge Jensen:

Don Bailey writes, by and through counsel, to provide a status report pursuant to the Court's minute order of June 20, 2023 (City of Rockford, Dkt. 830). Counsel for the Parties have been informed that Mr. Bailey is available to sit for a remote deposition on July 31, 2023 and August 1, 2023 in the above captioned matters. As the parties are aware, ongoing medical issues require that the deposition be conducted remotely, as previously agreed.

Respectfully Submitted,

/s/ D. Eric Shapland
D. Eric Shapland
ARNOLD & PORTER KAYE SCHOLER LLP
777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017-5844
(213) 243-4000
eric.shapland@arnoldporter.com
Counsel for Don Bailey

cc: Eric C. Lyttle (Counsel for ESI Defendants)
Robert Wallner (Counsel for MSP Plaintiffs)
Donald E Haviland, Jr (Counsel for Plaintiff City of Rockford)